

Law Office of Meredith S. Heller PLLC  
www.mshellerlaw.com

99 Park Avenue, Penthouse Suite  
New York, NY 10016  
Phone: (646) 661-1808  
Fax: (646) 661-1746  
msheller@mshellerlaw.com

November 8, 2022

**MEMO ENDORSED**

**VIA ECF**

Honorable Sidney H. Stein  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: *United States v. Mircea Constantinescu, et al.***  
**19-cr-651 (LTS) (SHS)**

Dear Judge Stein:

I write this letter on behalf of my client Mircea Constantinescu to respectfully request a sentencing adjournment of 30 days. Currently, Mr. Constantinescu's sentencing is scheduled for December 1, 2022. This adjournment is requested because I am caring for my mother in Ohio. Unfortunately, her condition has deteriorated, and I will need to be in Cleveland to assist with her care for much of the months of November and December.

The government, through A.U.S.A. Hanft, takes no position on this request. This is the second adjournment request of Mr. Constantinescu's sentencing date. I respectfully request an adjournment of 30 days, until January 3, 2023, or a time convenient for the Court.

Respectfully submitted,



Meredith S. Heller

Cc: A.U.S.A. Elizabeth A. Hanft (via ECF)  
A.U.S.A. Samuel P. Rothchild (via ECF)  
A.U.S.A. Margaret Lynaugh (via ECF)

**The sentencing is adjourned to January 3, 2023, at 11:00 a.m. Defense submission is due by December 13, the government submission is due by December 20.**

**Dated: New York, New York**  
**November 9, 2022**

**SO ORDERED:**



**Sidney H. Stein, U.S.D.J.**